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*Attorney for Defendants Fai Lam, in his capacity as  
Trustee of The Irrevocable Trust for Raymond Ni,  
Weihui Kwok and Yuanyuan Wu.*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

HF FOODS GROUP INC., a Delaware  
corporation

Plaintiff,

vs.

MAODONG XU; ZHOU MIN NI; FAI LAM,  
in his capacity as Trustee of THE  
IRREVOCABLE TRUST FOR RAYMOND  
NI; WEIHUI KWOK; and YUANYUAN WU,

Defendants.

Case No. 2:23-cv-00748 GMN-DJA

**DEFENDANTS FAI LAM, AS  
TRUSTEE, WEIHUI KWOK, AND  
YUANYUAN WU REQUEST AN  
EXTENSION OF TIME TO RESPOND  
TO PLAINTIFF'S COMPLAINT**

**(FIRST REQUEST)**

***Expedited Consideration Requested***

Pursuant to the provisions of Federal Rule of Civil Procedure 6 and Local Rule IA 6-1,  
Defendants Fai Lam as Trustee of the Irrevocable Trust for Raymond Ni, Weihui Kwok, and  
YuanYuan Wu ("Defendants"), by and through their attorney, Rew R. Goodenow of Parsons Behle  
& Latimer, respectfully moves this Court for an extension by thirty (30) days of their deadline to  
respond to the Complaint (ECF # 2) filed by Plaintiff HF Foods Group Inc. on May 11, 2023

1 (“Complaint”). This Motion is based upon the following Memorandum of Points and Authorities,  
2 the pleadings filed in this matter, and any argument or testimony the Court may entertain.

3 DATED: June 5, 2023.

By /s/ Rew R. Goodenow  
4 Rew R. Goodenow, Nevada Bar No. 3722  
5 PARSON BEHLE & LATIMER

6 *Attorney for Defendants Fai Lam, in his capacity as*  
7 *Trustee of The Irrevocable Trust for Raymond Ni,*  
8 *Weihui Kwok and Yuanyuan Wu*

9 **MEMORANDUM OF POINTS AND AUTHORITIES**

10 Pursuant to the provisions of Federal Rule of Civil Procedure 6 and Local Rule IA 6-1,  
11 Defendants, by and through their attorneys, respectfully move this Court for an extension by thirty  
12 (30) days of their deadline to respond to the Complaint filed by Plaintiff HF Foods Group Inc.  
13 (“Plaintiff”) and in support thereof states as follows:

14  
15 **I.**  
16 **PROCEDURAL BACKGROUND**

17 On May 11, 2023, Plaintiff filed the Complaint (ECF # 2), together with accompanying  
18 exhibits. The Complaint was filed with an emergency motion, which was mooted by later action by  
19 some of the Defendants.

20 The undersigned counsel was engaged today, June 5 2023. The undersigned counsel has  
21 requested that Plaintiff stipulate to a thirty (30) day extension. However, because today is at least  
22 one of the Defendant’s deadline to respond to the Complaint, and the undersigned counsel has not  
23 yet received a response to the request for extension, this Motion is filed, in abundance of caution.

24  
25 **II.**  
26 **ARGUMENT**

27 Defendants move to extend by thirty (30) days their deadline to respond to the Complaint  
28 Under Federal Rule of Civil Procedure 6, this Court may, for good cause, extend a deadline if a

request is made “before the original time or its extension expires.” Fed. R. Civ. P. 6(b)(1)(A); *see also* Local Rule IA 6-1(a). Good cause exists here. The undersigned counsel was just engaged today, June 5, 2023. The initial pleadings are voluminous.

### III. CONCLUSION

For the foregoing reasons, Defendants respectfully request that this Court grant their request for an extension by thirty (30) days of the deadline to file a response to the Complaint.

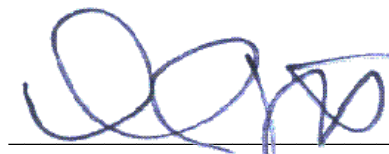
By: /s/ Rew R. Goodenow  
 Rew R. Goodenow, Nevada Bar No. 3722  
 PARSON BEHLE & LATIMER

*Attorney for Defendants Fai Lam, in his capacity as  
 Trustee of The Irrevocable Trust for Raymond Ni,  
 Weihui Kwok and Yuanyuan Wu*

### ORDER

Having reviewed Defendants' motion, the Court finds that they have demonstrated good cause to extend the deadline by which to respond to Plaintiff's complaint. Defendants' counsel represents that Defendants retained him the day at least one of the Defendants' answers was due. Additionally, there is a strong public policy in the Ninth Circuit of deciding cases on the merits, rather than technicalities. *See U.S. v. Signed Personal Check No. 730 of Yubran S. Mesle*, 615 F.3d 1085, 1091 (9th Cir. 2010). **IT IS THEREFORE ORDERED** that Defendants' motion to extend time [44] is **GRANTED**. Defendants Fai Lam, in his capacity as Trustee of The Irrevocable Trust for Raymond Ni, Weihui Kwok and Yuanyuan Wu shall have until **July 5, 2023** within which to answer the complaint.

DATED this 6th day of June, 2023.



\_\_\_\_\_  
 DANIEL J. ALBREGTS  
 UNITED STATES MAGISTRATE JUDGE

**CERTIFICATE OF SERVICE**

I hereby certify that I am an employee of the law firm of Parsons Behle & Latimer and that on this 5<sup>th</sup> day of June, 2023, I filed a true and correct copy of the foregoing **DEFENDANTS FAI LAM, AS TRUSTEE, WEIHUI KWOK, AND YUANYUAN WU REQUEST AN EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S COMPLAINT** with the Clerk of the Court through the Court's CM/ECF system, which sent electronic notification to the following:

Frank M Flansburg, III  
Emily Louise Dyer  
Maximilien Fetaz  
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/s/ Kathy Souviron  
Employee of Parsons Behle & Latimer